

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JIMMY L. ADKINS, KEREM BAY, LANA
BONGIOVI, CLEMENT CAMPBELL, ANGELO
CARPOLA, ALEXANDER CIOFFI, PATRICK H.
CRAIN, DAVID CRONK, NANCY F. DEBE, DENNIS
DELUCI, CHARLES J. ENGEL, MATTHEW
FARRELL, BENNY FAILLA, ROBERT J. GIANI,
JOHN R. LACKENBAUER, JEAN-PARNELL LOUIS,
WILLIAM J. MAHER, MICHAEL G. MCDOWELL,
JOHN ROSSI, WILLIAM R. SHANNON, FRED H.
SMITH, GARY E. SOBEK, DAMIAN SOBERS,
CARMELA SZYMANSKI, ANTHONY TANZA and
CYNTHIA TORRES,

Plaintiffs,

-against-

GARDA CL ATLANTIC, INC.,

Defendant.

Case No. 16-cv-00641

D'Aguino v. Garda Cl Atlantic., Inc.

**DECLARATION OF STEVEN J. MOSER IN SUPPORT OF MOTION TO VACATE
AND REMAND**

I, Steven J. Moser, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I represent the Plaintiffs Kerem Bay, Lana Bongiovi, Clement Campbell, Alexander Cioffi, Angelo Caropola, Patrick Crain, David L. Cronk, Dennis DeLucie, Charles J. Engel, Benny Failla, Matthew Farrell, Robert Giani, John Lackenbauer, Michael McDowell, William Maher, John Rossi, Gary Sobek, Damian Sobers, and Cynthia Torres in the above referenced action.
2. I make this declaration in support of Plaintiffs' Motion to Vacate and Remand.
3. Annexed hereto are true and correct electronic copies of the following documents:

Description	Exhibit No.
<i>Adkins v. Garda</i> Complaint, ECF No. 1 (17-cv-2532)	1
<i>Adkins v. Garda</i> Notice of Removal, ECF No. 1-1 (17-cv-2532)	2
Court's Order dated August 16, 2018, ECF No. 50	3
Defendant Garda CL Atlantic Inc.'s Objections and Responses to Plaintiffs' Jurisdictional Requests for Production	4
Defendant Garda CL Atlantic Inc.'s Objections and Responses to Plaintiffs' Jurisdictional Interrogatories	5

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: Huntington, New York
June 15, 2023

Steven John Moser
Steven John Moser